

IN THE
UNITED STATES DISTRICT COURT
FOR THE
WESTERN DISTRICT OF VIRGINIA
DANVILLE DIVISION

UNITED STATES OF AMERICA

Criminal No. 4:18CR00036

In Violation of:

V.

STEVIE JERMAINE JOHNSON, JR.
a/k/a "Stevie"

18 U.S.C. § 1962(d)

18 U.S.C. § 1963

INFORMATION

COUNT ONE

Racketeering Conspiracy

The United States Attorney charges that:

Introduction

1. The Rollin 60s Neighborhood "Crips" street gang was formed in the late 1960s in Los Angeles, California. The Crips street gang is comprised of individual units, or "sets," each identified or affiliated with a certain geographic area.

2. The ROLLIN 60s Crips ("ROLLIN 60s") is a set of the Crips street gang and their associates which have operated in the Western District of Virginia, primarily Danville, Virginia, since at least sometime in or about 2015.

a. In addition to their violent criminal activity, the ROLLIN 60s derive income from drug distribution and sales of firearms and stolen property.

b. The ROLLIN 60s are typically associated with an area in the City of Danville known as the "8" or "800." They work to control and maintain this area against other gangs.

- c. The ROLLIN 60s commonly utilize a variety of unifying marks, manners, and identifiers, including “gang signs,” which refer to hand gestures that are specific to the gang organizations. The ROLLIN 60s use certain phrases, lingo, and writing styles to promote and facilitate their gang and to show disrespect to others.
- d. The ROLLIN 60s operate under a loose leadership structure, with the head of the gang called “BKig Homie.” “BK” stands for “Bloods Killer.”
- e. The ROLLIN 60s function according to a set of rules, sometimes contained in “books of knowledge.” The books of knowledge can describe such things as the leadership structure, gang history, and general rules.
- f. The ROLLIN 60s frequently possess firearms, which they show themselves brandishing in publicly available videos and photographs in order to promote the gang’s violent and intimidating image. The ROLLIN 60s also use social media as a recruitment tool.

3. At all times relevant to this Information the ROLLIN 60s and its associates, in the Western District of Virginia and elsewhere, engaged in criminal activity, including but not limited to: acts involving murder, assault, obstruction of justice, drug trafficking, and conspiracy to commit those crimes.

The Racketeering Enterprise

4. At all times relevant to this Information, defendant **STEVIE JERMAINE JOHNSON, JR.**, MARCUS JAY DAVIS, KEVIN LAMONT TRENT, JR., KANAS LAMONT’E TRENT, DESHAUN LAMAR TRENT, PHILLIP DAEKWON MILES, SHABBA LARUN CHANDLER, MATTHEW CEASAR FERGUSON, ASHLEY TIANA ROSS,

LAQUANTE TARVARES ADAMS, JAQUAN LAMONT TRENT, and others known and unknown, were members and associates of a criminal organization, the ROLLIN 60s Crips street gang, which was engaged in, among other things, acts involving murder, assault, and the trafficking of controlled substances, within the Western District of Virginia and elsewhere.

5. The ROLLIN 60s, including its leadership, membership, and associates, constituted an "enterprise," as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise. This enterprise was engaged in, and its activities affected, interstate and foreign commerce.

Purposes of the Enterprise

6. The purposes of the enterprise included promoting and enhancing the enterprise and its reputation through, among other things, committing acts of violence, including acts involving murder and assault; enriching its members and associates through among other things, trafficking in controlled substances and committing acts of violence; prolonging the activities of the enterprise by providing assistance to members of the enterprise who committed crimes for and on behalf of the enterprise; and by thwarting efforts of law enforcement to apprehend enterprise members.

Manner and Means of the Enterprise

7. Among the manner and means by which the members and their associates conducted and participated in the conduct of the affairs of the enterprise were the following:

- a. Members engaged in shootings and acts involving murder;

- b. Members of the enterprise and their associates obstructed justice by destroying and hiding evidence and firearms and through witness tampering.
- c. Members of the enterprise and their associates distributed controlled substances, and used the proceeds of those drug transactions to benefit gang members and to help finance their enterprise

Role of the Defendants and Co-Conspirators

8. The roles of the defendants and co-conspirators included, but were not limited to, the following:

- a. MARCUS JAY DAVIS, a/k/a "Sticcs" was a member of the ROLLIN 60s, and was, for a time, the leader of the enterprise who recruited, directed, and guided other members of the enterprise in carrying out certain unlawful and other activities in furtherance of conducting the enterprise's affairs. His rank was a "BKig Homie," which placed him at the top of the racketeering enterprise hierarchy in Danville at times relevant to this First Superseding Indictment.
- b. KEVIN LAMONT TRENT, JR., a/k/a "Bad Ass" "Gates" or "SixOwe," was a member of the ROLLIN 60s.
- c. KANAS LAMONT'E TRENT, a/k/a "LA" was a member of the ROLLIN 60s.
- d. DESHAUN LAMAR TRENT, a/k/a "Da Da" or "Six" was a member of the ROLLIN 60s.
- e. PHILLIP DAEKWON MILES, a/k/a "R" or "Sammy" was a member of the ROLLIN 60s.

- f. SHABBA LARUN CHANDLER, a/k/a "Trill" was a member of the ROLLIN 60s.
- g. MATTHEW CEASAR FERGUSON, a/k/a "MC" was a member of the ROLLIN 60s.
- h. ASHLEY TIANA ROSS, a/k/a "First Lady" was a member and associate of the ROLLIN 60s.
- i. LAQUANTE TARVERES ADAMS, a/k/a "Spazz" was a member of the ROLLIN 60s.
- j. JAQUAN LAMONT TRENT, a/k/a "Hatch" was a member and associate of the ROLLIN 60s.
- k. STEVIE JERMAINE JOHNSON, JR., a/k/a "Stevie" was a member of the ROLLIN 60s.

The Racketeering Conspiracy

9. From in or about sometime in 2015, the exact date being unknown, and continuing through the date of this Information, in the Western District of Virginia and elsewhere, the defendant **STEVIE JERMAINE JOHNSON, JR.**, MARCUS JAY DAVIS, KEVIN LAMONT TRENT, JR., KANAS LAMONT'E TRENT, DESHAUN LAMAR TRENT, PHILLIP DAEKWON MILES, SHABBA LARUN CHANDLER, MATTHEW CEASAR FERGUSON, ASHLEY TIANA ROSS, LAQUANTE TARVARES ADAMS, and JAQUAN LAMONT TRENT, together with each other and other persons known and unknown, being persons employed by and associated with the ROLLIN 60s, an enterprise which was engaged in, and the activities of which affected, interstate and foreign commerce, knowingly and intentionally did combine, conspire, confederate and agree with each other, and with persons

known and unknown, to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity, as that term is defined by Title 18, United States Code, Sections 1961(1) and 1961(5), consisting of multiple acts involving:

- a. Murder, chargeable under Virginia Code, Section 18.2-32, 18.2-22, 18.2-26 and 18.2-18 and the common law of Virginia;

multiple acts indictable under:

- b. 18 U.S.C. § 1512 (Tampering with a witness, victim, or an informant);
- c. 18 U.S.C. § 1503 (Obstruction of justice);

multiple offenses involving:

- d. Trafficking in controlled substances in violation of 21 U.S.C. §§ 841 and 846.

10. It was further part of the conspiracy that **STEVIE JERMAINE JOHNSON, JR.** agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise.

Overt Acts

11. In furtherance of the conspiracy and to achieve the objective thereof, **STEVIE JERMAINE JOHNSON, JR.**, and others known and unknown, performed and caused to be performed a number of overt acts in the Western District of Virginia and elsewhere. The overt acts performed by the conspirators included, but are not limited to:

- a. On or about August 20, 2016, **STEVIE JERMAINE JOHNSON, JR.**, and others known and unknown, murdered Christopher Lamont Motley and shot at and attempted to murder Justion Wilson in the Southwyck Apartment complex in Danville, Virginia.

- b. On or between 2016 through October 30, 2016, **STEVIE JERMAINE JOHNSON, JR.** and others known and unknown, trafficked in controlled substances throughout the Danville, Virginia area.

NOTICE OF SPECIAL SENTENCING FACTORS

12. On or about August 20, 2016, in the Western District of Virginia, **STEVIE JERMAINE JOHNSON, JR.**, and others known and unknown, did willfully, deliberately and with premeditation, kill Christopher Lamont Motley, in violation of Virginia Code Sections 18.2-32 and 18.2-18.

13. All in violation of Title 18, United States Code, Sections 1962(d) and 1963.

Dated:

Thomas T. Cullen */s/ [Signature]*
THOMAS T. CULLEN
UNITED STATES ATTORNEY